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July 30, 2021

**Via PACER**

Magistrate Judge Douglas E. Arpert  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Jackson Trails, LLC v. Township of Jackson, et al.**  
**Docket No.: 3:20-CV-01150**

Dear Magistrate Judge Arpert:

As Your Honor is aware, this firm represents Defendants in the above referenced litigation. The parties have been engaged in good faith settlement discussions for over a year and have made significant progress towards a mutually agreeable resolution. However, we have reached a point where all involved believe that the assistance of the Court may be necessary to help bring this matter to a final resolution. Accordingly, I am requesting on behalf of all counsel that Your Honor conduct a settlement conference, either virtually or in-person, depending on the Court's status. We also request that the Court require that a representative of each party with authority to at least recommend a settlement to the client be present, as well as a representative of the insurance carrier. The parties are currently scheduled for a conference before Your Honor on August 16, 2021. In the event that Your Honor does not have time for a full settlement conference that day the Parties would respectfully request that the Court schedule something soon thereafter. Of course, this office shall provide any additional information that the Court requires.

Respectfully submitted,

/s/Brent R. Pohlman, Esq.  
BRENT R. POHLMAN, ESQ.